

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA,	:	No. 2:15-cr-228
	:	
Plaintiff,	:	Judge: GRAHAM
	:	
vs.	:	18 U.S.C. § 1951(a)
	:	
JOHN P. RAPHAEL,	:	(Felony)
	:	
Defendant.	:	

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTORY ALLEGATIONS

1. Defendant JOHN P. RAPHAEL was a consultant and lobbyist based in Columbus, Ohio. As a consultant and lobbyist, the defendant was hired and paid by companies that sought to do business with municipalities and counties in Ohio, and he sought to influence the decisions and actions of public officials in favor of his clients.

2. Company A was a Delaware corporation with its headquarters located in Phoenix, Arizona. Among other things, Company A operated traffic enforcement systems, including red-light and speed photo systems, in numerous cities in the United States and Canada, including municipalities in the State of Ohio.

3. From in or about March 2005 through in or about February 2013, Company A hired and paid the defendant in connection with business that Company A was seeking to obtain and retain with municipalities in Ohio, including Columbus and Cincinnati.

4. From in or about 2005 through in or about 2013, with the assistance of defendant RAPHAEL, Company A sought, was selected, and obtained contracts to provide red light photo enforcement systems in the City of Columbus, including fixed and mobile cameras. Each of Company A's contracts, expansions, extensions, and modifications required the approval of the Columbus City Council. The contracts and their ultimate implementation and operation with the City of Columbus, including expansions, extensions, and modifications, resulted in Company A and the City of Columbus each receiving over \$10 million in gross revenue.

5. From in or about March 2005 through in or about June 2008, with the defendant's assistance, Company A sought to obtain contracts with the City of Cincinnati to provide red light photo enforcement systems in Cincinnati. Company A was not awarded a contract to provide or operate an enforcement program in Cincinnati.

6. During the time period that Company A was seeking to retain its contracts in Columbus, the defendant repeatedly pressured and induced Company A to make campaign contributions to the campaigns of various elected officials in Columbus and Cincinnati and by communicating to Company A's executives that Company A would lose its contracts and suffer an economic loss if it did not make the payments.

COUNT ONE

HOBBS ACT
INTERFERENCE WITH COMMERCE BY THREATS
(18 U.S.C. § 1951(a))

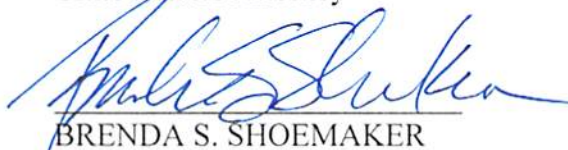
7. Paragraphs 1 through 6 are realleged and incorporated by reference as though fully set forth herein.

8. Between in or about 2005 and in or about February 2013, in the Southern District of Ohio and elsewhere, the defendant, JOHN P. RAPHAEL, did knowingly obstruct, delay, and affect, and attempted to obstruct, delay, and affect, in any way and degree commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in 18 U.S.C. § 1951; that is, RAPHAEL obtained and attempted to obtain the property of Company A, with Company A's consent, induced by the wrongful use of fear of economic harm.

All in violation of 18 U.S.C. § 1951(a).

CARTER M. STEWART

United States Attorney

A handwritten signature in blue ink, appearing to read "Brenda S. Shoemaker", is written over a horizontal line.

BRENDA S. SHOEMAKER
Columbus Deputy Branch Chief
Assistant United States Attorney